

INFINITY SERVICES PARTNER COMPANY (PTY) LTD: PRIVACY STATEMENT

ABOUT OUR PRIVACY POLICY

Our privacy policy gets updated from time to time. Whenever we make a change, we'll post this on our website and let you know if there is a material change. For more information or any updates on the privacy policy, please visit our Privacy Portal on <https://www.infinityspc.co.za/infinity/privacy-policy/terms>

HOW TO USE THIS PRIVACY POLICY

In this privacy policy, we explain how we collect, use, share and protect your Personal Information when you use our and services and our website.

It is important to note that when you engage with us, you acknowledge that we require your Personal Information, as defined in the Protection of Personal Information Act No 4 of 2013 (POPIA) and other related regulations and need to process such Personal Information to provide services to you for purposes including to confirm, update and enhance our records, to confirm your identity and additional purposes as detailed below.

The provision of your Personal Information in terms of this policy is mandatory and you will not be able to continue using our services, should you object to providing us with such information.

WHO WE ARE

We are Infinity Services Partner Company (Pty) Ltd (*hereinafter referred to as "Infinityspc"*)

Our office is 082 Vodacom Boulevard, Vodavalley, Midrand, 1685. We are registered in the Republic of South Africa under company number 2020/261727/07. Infinityspc is also registered with the Information Regulator in its capacity as a Responsible Party.

Unless otherwise specified in a separate privacy statement, the way your Personal Information is processed will remain compatible with the wording of this policy. You know we want

In this Privacy Policy:

- "we/us" means Infinityspc (Pty) Ltd;
- "third party" means someone who is not you or us;

- “Partner organisation” means external third-party business entity that provides value-added services;
- “Personal Information” refers to Personal Information about you as defined in POPIA and includes your, email address, phone number, company name, name, surname and your province/country)
- “Process or Processing” means to any operation or activity, whether automated or not, concerning Personal Information, including collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, use, dissemination by means of transmission, distribution or making available in any other form, merging, linking, as well as blocking, degradation, erasure or destruction of information.

HOW TO CONTACT US

Your opinion matters to us – if you have any questions about our Privacy Policy or your privacy settings, please submit your query to privacy@infinityspc.co.za and a member of our team will respond to you. If you would like to mail us by post directly, send it to:

The Privacy Office – Legal Affairs Vodacom (Pty) Ltd
Corporate Park
082 Vodacom Boulevard Midrand
1685

OUR PRINCIPLES

We are committed to respecting your privacy. We take privacy, security and complying with data protection and privacy laws seriously. We adhere to principled practices in handling personal information, ensuring accountability, fairness, openness, and giving you control over your information

PERSONAL INFORMATION WE COLLECT ABOUT YOU

Directly from you

The information we collect about you and how we collect it can vary depending on the services that you use and subscribe to, how you have used the services, how you have interacted with Infinityspc even if you aren’t a customer, or what we have obtained from a third party.

We will collect your Personal Information when you, for example:

- Contact us through various channels for support or ask for information about our services;
- Visit or browse our Infinityspc website

From third parties

Information collected not directly from you

- Information we obtain from other sources, such as credit agencies, fraud-prevention agencies, and from other data providers. This includes demographic data, interest-based data, and internet browsing behaviour.

We are required to take all reasonably practicable steps to ensure your Personal Information is complete, accurate, not misleading and updated on a regular basis. To ensure this, we will always endeavour to obtain Personal Information from you directly. Where we are unable to do so, we will make use of verifiable independent third-party data sources who have the necessary authority to provide us with such information. We also collect information from certain organisations, where appropriate and to the extent we have legal grounds to do so. These include fraud-prevention agencies, business directories, credit check reference/vetting agencies, billing calculating agencies and connected network providers.

THE TYPES OF INFORMATION WE MAY HAVE, WHERE APPLICABLE:

1. **Contact details** Such as your name, phone and/or mobile number, email address, or company name. Where you have provided us with the Personal Information of a third-party (for example your spouse or family member), you guarantee that such third-party has given you consent to provide us with their Personal Information. Where you provide us with the Personal Information of a person under the age of 18 years (a minor), you confirm that you have the necessary legal authority or legally competent, to provide their Personal Information to us;
2. **Your correspondence or contact with us** Such as an email or letter sent, or other records of any contact with us;
3. **Cookies** See the 'Cookies' section for details on what we collect using cookies, web beacons and other technologies including advertising data;
4. **Photographs and images** when attending any of our events or functions or accessing premises with surveillance cameras;
5. **Understanding what you want (the use of cookies).** We use cookies (small text files stored in your browser) and other techniques such as web beacons (small, clear picture files used to follow your

movements on our website). This, in turn, helps us make our website relevant to your interests and needs. They also help us find information once you have logged in or help us link your browsing information to you and your Personal Information. We may use a persistent cookie (a cookie that stays linked to your browser) to record your details so we can recognise you if you visit our website again.

Cookies by themselves cannot be used to discover your identity. Cookies do not damage your computer. You can set your browser to notify you when you receive a cookie. This enables you to decide if you want to accept it or not. If you choose not to accept cookies from our website this may limit its functionalities or performance. For more details on how we use cookies and your rights in respect thereof, please refer to the “Our Cookies policy” section which can be accessed [here](#).

HOW WE USE YOUR PERSONAL INFORMATION AND OUR LAWFUL BASIS TO DO SO

We will use your Personal Information / company information for a number of purposes ranging from enabling us to provide you the relevant information you have requested.

Whenever we use your Personal Information, we do so based on a specific lawful basis under data protection law listed below:

- For more information, visit the “Your rights” section of this policy.
- **Compliance with a mandatory legal obligation**, including for example, where a particular law requires Infinityspc to process Personal Information for a defined purpose.
- **Consent you provide** where Infinity does not rely on another legal basis (referred to above). Consent may be withdrawn at any time. When you give your consent, you will be given details on how to change your mind or visit the “Your rights” section of this policy for more information.

Mergers and Acquisitions

If we reorganised or merged with or divested part of our business to another organisation we may need to provide your information to that other organisation or their advisers or receive Personal Information from that other organisation.

Please see the table below for more information. Below you can find an overview of the categories of Personal Information we process about you, the purposes for which we process that Personal Information and the lawful basis upon which we rely to conduct that processing.

a) To improve our service

We collect information such as on your use of our website on an aggregated or anonymous basis in order to help us manage and improve our website.

How is your information used?	What data is used?	Lawful basis
<p>Improving and innovating our services through third parties</p> <ul style="list-style-type: none">We collect and combine information in order to monitor your use of our website, as well as to help us to improve the quality of our website. We provide this information to third parties (for example, to content providers and advertisers) but any such third-party reporting shall not include information which may identify an individual customer.	Anonymised/ aggregated: Account information	Legitimate Interest

HOW WE SHARE YOUR PERSONAL INFORMATION

Where applicable, we share information about you with:

- To fulfil your request or provide additional information to you
- When addressing your query or question regarding our Infinityspc services
- Law enforcement agencies, government bodies, regulatory organisations, courts or other public authorities if we have to, or are authorised to by law;
- A third party or body where such disclosure is required to satisfy any applicable law, or other legal or regulatory requirement

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION FOR?

We may not retain your Personal Information any longer than is necessary for achieving the purpose for which your Personal Information was collected or subsequently processed, unless:

- The retention of your Personal Information is required or authorised by law;
- We reasonably require your Personal Information for lawful purpose related to our function or activities;
- The retention of your Personal Information is required by a contract that we enter into with you; or
- You or competent person consent to the retention of Personal Information.

As a general rule, information is retained for a period of 5 years after termination of services. However, given other lawful and legitimate business needs the information may be retained longer to fulfil the business or legal requirements.

We'll keep some Personal Information for a reasonable period after your contract with us has finished. We, or one of our partners, may contact you about Infinityspc services during this time.

KEEPING YOUR PERSONAL INFORMATION SECURE

We have specialised security teams who constantly review, improve, and ensure the implementation of appropriate, reasonable technical and organisational measures to protect your Personal Information from unauthorised access, accidental loss, disclosure, or destruction. We are required in terms of POPIA to notify you and the Information Regulator, if any of your Personal Information has been compromised.

Communications over the internet (such as emails) aren't secure unless they've been encrypted. Your communications may go through a number of countries before being delivered, as this is the nature of the internet. We cannot accept responsibility for any unauthorised access or loss of Personal Information that is beyond our control.

We'll never ask for your secure personal or account information by an unsolicited means of communication. You're responsible for keeping your personal and account information secure and not sharing it with others. Our website may provide links to third-party websites. We cannot be responsible for the security and content of such third-party websites. You are therefore required to make sure you read that company's privacy and cookies policies before using or putting your Personal Information on their site. The same applies to any third-party websites or content you connect to using our services. You may choose to disclose your information in certain ways such as social plug-ins (including those offered by Google, Facebook, Twitter, LinkedIn and Pinterest) or using third-party services that allow you to post reviews or other information publicly, and a third party could use that information. Social plug-ins and social applications are operated by the social network themselves and are subject to their own terms of use and privacy and cookies policies. You should make sure you're familiar with these.

UNAUTHORISED THIRD-PARTY ACCESS TO YOUR INFORMATION

Despite the security measures we have in place to protect your Personal Information, (firewalls, password access and encryption methods) you acknowledge that it may be accessed by an unauthorised third party, e.g., as a result of an illegal activity.

In the unlikely event of such access, we will notify you, where possible, via email, SMS or using the address you have provided us with, within a reasonable time of us becoming aware of such occurrence.

YOUR RIGHTS

Below we set out details on how you can exercise your rights. If you have a question or cannot find the answer, please email privacy@infinityspc.co.za to speak to a privacy representative.

Right to access Personal Information

You have the right to request a record or description of the Personal Information that Infinityspc holds about you. This includes the right to request Infinityspc to confirm, free of charge, whether or not we hold any Personal Information about you; as well as information about the categories of third parties who have, or have had, access to your Personal Information. To make this request as an individual or an authorised third party, you can contact our privacy office at privacy@infinityspc.co.za

Right to correct Personal Information

You have the right to correct information held about you if it's not accurate, out-of-date, excessive, irrelevant, or misleading.

To manage Cookies and understand more about what they are:

Want to disable a cookie, or understand more about what these are? Check the cookies section of this policy for full details on how to do this.

Right to object to use of Personal Information

You have the right, in certain circumstances, to object to Infinityspc processing your Personal Information. In order for Infinityspc to provide you with services, Infinityspc is required to process your Personal Information and as such the provision of your Personal Information is mandatory and you may not object to same in order to continue using our services. For more information or to exercise this right, please contact our privacy office at privacy@infinityspc.co.za. If this relates to an automated decision performed on you (this means with no human involvement), please let us know and we will review your request.

Right to restrict use of your Personal Information

If you feel that the Personal Information we hold on you is inaccurate, or you believe we shouldn't be processing your Personal Information, don't hesitate to get in touch with our privacy office at privacy@infinityspc.co.za to discuss your rights. In certain circumstances, for example where you contest the accuracy of your information, or where Infinityspc no longer requires your information for achieving its purpose but must maintain it for purposes of proof, you have the right to ask us to restrict processing.

Right to deletion

Infinityspc strives to only process and retain your Personal Information for as long as we need to. In certain circumstances, for example, where you indicate that your Personal Information is inaccurate, irrelevant, excessive, out of date, incomplete, misleading, or obtained unlawfully, you have the right to request that we erase your Personal Information that we hold. If you feel that we are retaining your Personal Information longer than we need, it is worth first checking that your contract with Infinityspc has been terminated, which you can do with our privacy office at privacy@infinityspc.co.za. If your contract with Infinityspc has been terminated, we may still have lawful grounds to process your Personal Information.

HOW TO LODGE A COMPLAINT

If you want to contact us about any of your rights or should you believe that Infinityspc has used your Personal Information contrary to applicable law, you undertake to first attempt to resolve any concerns with Infinityspc directly. Kindly contact our privacy office at privacy@infinityspc.co.za. If you are not satisfied with such process, you have the right to lodge a complaint with the Information Regulator at:

The Information Regulator (South Africa)

JD House

27 Stiemens

Street

Braamfontein

Johannesburg

2001

Email: infoereg@justice.gov.za

Complaints email: complaints.IR@justice.gov.za

NOTIFICATION OF CHANGES TO PRIVACY POLICY

We are continually improving our methods of communication and adding new functionality and features to this Website and to our existing services. Because of these ongoing changes, changes in the law and the changing nature of technology, our data protection practices will change from time to time. If and when our data protection practices change, we will update this privacy policy to describe our new practices. If we do, we will notify you the next time you visit this site or interact with us through any of our other communication channels. We encourage you to check this page regularly

Last updated: **20 June 2025**